A F T E R N O O N P R O C E E D I N G S

(Whereupon the proceedings hereinafter were stenographically reported by Julie Bloome.)

EXAMINER WOODS: Back on the record. Mr. Bowen?

MR. BOWEN: Thank you, Your Honor.

CROSS EXAMINATION BY MR. BOWEN:

Q. Afternoon. Nice to see you again.

A. Thank you. Afternoon.

Q. Okay. You have a lot of testimony here, like a hundred pages, so what I'm going to do, I think, is just kind of step through sequentially, and I may -- you obviously have addressed some issues in your second round testimony, or your rebuttal testimony you also address in the direct testimony, so we can talk about the issues at the same time if we want to. Let's start, first of all, briefly, with

your background. I understand that you don't have an engineering degree, an undergraduate degree; is that right?

A. That's correct.

Q. Okay. Have you ever -- I know you worked for the company for 25 years, have you ever worked in the line outside plant field force?

A. Yes.

Q. So you have driven a truck out and done things like deloaded pairs and cut bridged tap, and that kind of thing?

A. No, I've supervised those functions.

Q. So you supervised groups that did those tasks.

A. Yes.

Q. Okay. All right. And you said that in your testimony at page 1, your direct, that you have network regulatory responsibilities. Can you explain what that means? What is network regulatory? It seems like two different groups to me. You got "network" and you got "regulatory."

A. Well, and we have an organization that

handles all of the network issues, the network platforms, any engineering, any type of networks which those types of regulatory issues are handled in our group, as opposed to a regulatory group that would handle, say, more of marketing and product, regulatory people.

Q. Okay. So you're in regulatory, but you do network issues?

A. Correct.

Q. That's different than being in the line, if I can use that term, the line organization, you're in the staff group?

A. Yes. And I would say that I'm in the network organization. I handle regulatory. I'm not in the regulatory department. I'm in the network department.

Q. Okay. But the regulatory subpart of that, not the line engineers, right?

A. Correct.

Q. Okay. Okay. There are several references to -- one of them is at page 8 of your direct testimony - data base called SWITCH. That's

S W I T C H - all capital letters. Do you see that?

A. Yes.

Q. That's one of the references. And the context on page eight is you're talking about inventorying equipment in this data base, right?

A. Yes.

Q. This is what's commonly known as Operations Support Systems, or an OSS; is that right?

A. No.

Q. No?

A. No, that's correct.

Q. Didn't the FCC -- well, never mind. Never mind. If it's not an OSS, what is it?

A. This data base is a back-up system data base, it's not an OSS data base, in terms of ordering and preordering and provisioning. It's a data base that is a, what we call a back office system data base, not as an OSS?

Q. I'm having a bad dream here, I think. You were here in the arbitration, right?

A. Yes.

Q. And Ms. Jacobson is the OSS witness there

and here, right?

A. Yes, she is.

Q. And I think you were there when she was testifying, right?

A. Yes, I was.

Q. Do you recall her saying that -- do you recall her definition of an OSS?

A. Yes.

Q. Is that the same as yours?

A. It was the ordering and the preordering, the provisioning that the CLECs -- well, I'm not going to try and paraphrase her testimony.

Q. Just tell me your definition of an OSS.

A. My definition of an OSS would be the -- let me back up and just say that if the -- CLEC would have interfaces to Ameritech's interfaces, so through the interfaces, those are the OSSs, those interfaces are the OSSs as opposed to the pure data base that may reside layers down.

Q. The interfaces are commonly called a graphical user interface, or a GUI, right?

A. Yes.

Q. And you're familiar with the SPCs GUIs like variegate, for example?

A. No.

Q. No. Okay. We won't go too far into that, but you use the term OSS to mean that interface, but not the systems that it accesses, right?

A. When it is -- when it's discussing the ordering and the preordering and how those flows go from service orders to the billing part, all those interfaces that you interface with, those are what I call OSS.

Q. So you call the interfaces OSS, but you don't call, for example, you've heard of LFACs?

A. LFACs, yes.

Q. LFACs. It stands for loop facilities Assignment and Control Systems, right?

A. Yes.

Q. And you've heard of TIRKS?

A. Yes.

Q. That's the Trunk Integrated Record Keeping System, right?

A. Yes.

Q. Are LFACs and TIRKS OSSs?

A. Not in my definition, no.

Q. Okay. So, I think you said SWITCH is not an OSS in your definition?

A. Yes, that's correct. It's not an OSS.

Q. So we'll leave that dispute for Ms. Jacobson. What's in SWITCH? What information is in SWITCH that's relevant to line sharing?

A. The information that's in SWITCH that's relevant to line sharing is, that is the data base where we inventory the splitter ports.

Q. Okay.

A. Now, we also inventory in SWITCH the office originating equipment, the OE equipment, is inventoried in the SWITCH data base, and the pot service orders take a flow that takes them through the SWITCH data base for assignment, whereas special circuits go through the TIRKS flow and they're designed, so we have two basic systems, the TIRKS system goes the design route the order it's designed, and if it's pots flow, it gets assigned through the SWITCH data base, LFACs and SWITCH.

Q. Okay. You've heard the term CFA, I take it?

A. Yes.

Q. What does that stand for?

A. Connecting facility assignment.

Q. And where are the CFAs in the book?

A. For line sharing?

Q. Yes.

A. They are inventoried in the SWITCH data base, and then if the CLECs chooses to use the same CFA for design circuits, then they're also inventoried in the TIRKS data base, but they're inventoried as separate pieces.

Q. Okay. Now when you say office equipment, do you mean basically line carts on the SWITCH, the voice SWITCH?

A. Yes.

Q. So from, I mean, Ameritech needs to know about what office equipment, or OE, is associated with a particular customers dialtone line, right?

A. Yes.

Q. But the CLEC doesn't need to know that

necessarily if they're line sharing, right? They don't need to care about what line card port you're assigning for voice service?

A. Well, for the originating equipment, that's correct. For the splitter, that would be incorrect.

Q. Right. I want to do them one at a time. The splitter port's also in SWITCH?

A. Correct.

Q. And we need to know that.

A. Yes.

Q. And so is the CFA information?

A. That is correct.

Q. That's also in SWITCH?

A. Yes.

Q. And we need to know that too.

A. Well, you provided that to us.

Q. Once we give it to you, then the information we give you resides on the CFAs designed in SWITCH? That's the data base that holds that information for line sharing?

A. Understanding that it's not like an

inventory within SWITCH of all your CFAs, it's only an inventory of the working lines --

Q. Right.

A. -- not of all of your -- well, I take that back. We do inventory the pair range. It doesn't become activator associated with anything, unless a service order flows through.

Q. Okay. But isn't it right -- doesn't SWITCH inventory what we give in terms of pair range, so that we can basically say, okay, I've got a new customer, please use CFA number blank and arrange that or inventory that in SWITCH system?

A. Correct.

Q. All right. All right. Let's switch -- shift gears and talk about -- I want to talk about frame exhaust, and in the context of the placement of splitters. You talk about in a couple contexts, one is the shelf at a time issue. I don't want to focus on that, I want to focus with you on the splitter being placed on the MDF versus in an IDF, okay?

A. Okay.

Q. And you're recommending that when

Ameritech owns the splitter, that it be placed in an IDF? Do I understand your testimony correctly?

A. Yes, that's correct.

Q. And you're opposing Rhythm's suggestion that when you own a splitter, it should be placed on the MDF, correct?

A. That is very correct.

Q. All right. And one of the reasons that you give on page -- I think about page 15 of your direct for -- you think supports your position that you should put the splitter in the IDF, is a citation to the FCC, and in fact the Court of Appeal's decision and so forth, concerning where equipment goes in your central office. Do you see that part of your testimony?

A. Yes, I do.

Q. Now, again, I'll ask you like I've asked Mr. Lube, you're not a lawyer?

A. Correct.

Q. So you're citing these decisi ons based on your lay understanding of what they mean?

A. Yes.

Q. Now, you think that that Court of Appeals for the DC circuit order lets Ameritech put splitters that they own wherever they choose in the central office?

A. Yes.

Q. And what that means, I guess, is that Ameritech has the sole discretion under your position to put that splitter anywhere it wants to in the central office? We don't have a say as a CLEC; is that right?

A. Well, what I'm saying, and the reason why I quoted this is because they vacated the rule that said that CLECs could place their equipment anywhere in our office, and certainly, if that is going to take place, then I use this to say then certainly they wouldn't dictate where my equipment would go in my central office.

Q. Let's do this -- just in plain English, what you're saying is, you think that that DC Court of Appeal's opinion lets you put those splitters wherever you want to in your central office, and we have no input or say as to where that might be; is that right?

A. Yes. I think that we should be able to allocate our space in our central office and use it in the most efficient manner. That's what we feel like we've done.

Q. I understand, but you're agreeing with me that you have the sole and complete discretion here to place the splitters?

A. It's our equipment yes. I believe -- well, not -- but -- I will say this, though, that part of the reasons, one of the reasons, the reason why that the splitters are in the place where they are, is because of the line sharing order.

Q. What I'm saying is, if you have two interested parties, Rhythms and Ameritech Illinois, and we're interested in deciding where the splitter is going to be placed, you have complete and sole discretion to make that decision when you own the splitter, isn't that right? We don't have any say?

A. I would say, though, that we didn't, because we do have a line sharing order that talks about that and gives us direction on where we place those, so we use the line sharing order in this

particular instance to determine where the equipment would go.

Q. As between Rhythms and Ameritech -- so I guess we do have some say, right?

A. Well, in Rhythm's case, I mean, you're putting in your own splitters, but you're saying that if you were using our splitters, would we change the location where they are because you requested us to?

Q. I'm just trying to figure out, based on your recommendation to this Commission, are you saying that Rhythms has any say or not as to where you'll place your splitters when you own them?

A. Well, to the extent that Rhythms was a party of the line sharing order and filed comments and the order came out with everybody's input, yes.

Q. So I should --

A. Every party --

Q. So I should cite the line sharing order and say, "I want the splitter to go over there," and you'll say okay?

A. Likely to be placed between the MDF and the equipment, the DSLAM equipment.

Q. Okay. What do you think the line sharing order says in any way that constrains your choice of splitter placement?

A. Test access.

Q. So it needs to be in an area that is what? Accessible to CLECs, or not?

A. Accessible to CLECs, absolutely.

Q. And that means what you call a common area; is that right?

A. Yes.

Q. And what does that exclude? What parts of the office does that exclude?

A. The common area typically excludes everything that's not common for -- I mean, you're not going to the frame, you're not going to the vault, you're not going to the piece of equipment, I mean, the common area is the area where the CLECs have access to, so everything else you don't have access to, you're excluded from.

Q. I'm glad to hear you say that, but let me just see what that means. It doesn't include c able as well; is that right?

A. True.

Q. It doesn't include the SWITCH itself; is that right?

A. True.

Q. Does it include any of your line ups for transmission equipment?

A. No, it does not. I mean -- yes, that area's excluded as well.

Q. So when you say common area, do you mean an area that you have designated in the central office as being a common area?

A. Yes.

Q. And everything else besides that is off limits; is that right?

A. Yes, except for your caged areas.

Q. Sure, sure. All right. So you think the FCC order says that you have to place the Ameritech owned splitters in a common area?

A. No, that's not what it said.

Q. I thought you said the line sharing order guided or restricted your choices as to where to put it?

A. It did.

Q. How did it do that?

A. Well, the line sharing order told us that we had to have test access at the splitter or through a crossconnect to a CLECs collocation cage. Because we're doing a line at a time, it's a little impossible if you had ten CLECs in an office to wire out appearances for all 96 lines to all ten CLECs, so to give you test access through wiring from the splitter to the collocation is not what any of the CLECs in a collaborative ever want, so that was like a non-discussion because we all agreed that was not a good thing to do, so then it became we'd have to have test access at the splitter if we were going to provide test access the way that the line sharing order suggested.

Q. Okay.

A. So because we were providing test access at the splitter, at the splitter card, and we put the splitters in the common area so the CLECs would have 24 by seven access to the splitter.

Q. Oh, so the FCC did not say you had to put

Ameritech owned splitters in a so-called common area, it just said you have to have CLECs test access, right?

A. The order specifically states that is likely that the splitters would be located between the DSLAM and the frame.

Q. Do you recall my question?

A. Did the FCC order specifically tell us that we had to put the splitters in the co mmon area.

Q. Yes.

A. No, it did not.

Q. Okay. That's your interpretation of the order as a company, right?

A. Yes.

Q. You've heard of cageless collocation, right?

A. Yes.

Q. And is that, I don't want to get too far into that, but is that allowing CLECs to place their equipment in the line ups without enclosing that equipment in a cage?

A. It is, but it's not in the ILECs line up.

Is that what I heard you say?

Q. Well, in line ups in this central office of an ILEC?

A. Well, the line ups again are where the CLECs collocation areas been determined that that is the collocation area, and if it's caged, then it's secured, and if it's cageless, then you don't have a cage around it, but it's still in the common area, the areas that's designated for the collocation in that central office, if it's not in our line up, if it were, it would be virtual collocation.

Q. So you use the term common collocation to equate to the area where you would also have CLECs placing equipment in the cageless collocation configuration, right?

A. Yes, could be.

Q. It "could" be. Is there some difference between those two then? Let me put it this way: Is all cageless collocated equipment in what's called a common area in Illinois?

A. Well, I think they call it collocation area in Illinois.

Q. Well, I'm just using your terms. You're saying splitters go in common areas?

A. Right.

Q. I'm trying to understand if that's the same as the area where you will see cageless collocations for other purposes than CLECs?

A. Yes.

Q. It is?

A. Yes.

Q. All right. And you choose where that common area is at, right?

A. I --

Q. Not you personally, but the company does.

A. I would assume that -- I would be assuming that they designate the area of the office where there is space for the CLECs to put their equipment.

Q. I mean, Ameritech, as opposed to CLECs, specified the location it's going to be called a common area, right?

A. Well, I'm sure that there's a lot of guidelines around as to how they designate that space,

and I don't know that, so I'm really not the best person to answer that question.

Q. Well, you're testifying as to what the FCC said about where collo equipment can go and the direct holding of that decision is the point we're talking about here.

A. Well, no. The point you'r e bringing up is that, would I agree that we unilaterally determine every -- all the footage in the central office that can be available to CLECs, and I said that I'm not sure that there is not guidelines in the collocation laws or orders that give some guidance to that. I don't know that. That's what I was referring to.

Q. My question is, as between Ameritec h and the CLECs, like Rhythms or anybody else, isn't it correct, and aren't you citing this decision to support this proposition that CLECs have no influence at all over where a common area is placed in the office?

A. I'm saying that this order says that CLECs can't pick and choose the location where their equipment goes.

Q. Do CLECs or don't they have any influence at all over where that common area is decided to be placed?

A. Again, I don't know that, because there has been very many orders that have been issued that took in account the CLECs, and those orders were written, and I'm assuming we followed them in the collocation tariffs and the collocation practices, but I truly don't know the answer to that specifically.

Q. So the only thing you know about collocation is the DC Court of Appeals --

A. What I'm familiar with with collocation is how we deployed our splitters, and to that, I am familiar with.

Q. Okay. Well, I want you to -- I'm going to ask this question very carefully. Is it possible, not will you do it, or might you do it, but is it possible that Ameritech excising the authority you think that Ameritech has, could put the splitters that it owns in an inefficient location from an engineering perspective?

A. No, I don't think mounting splitters on

the IDF is an inefficient arrangement. I think it's an efficient arrangement.

Q. Well, where does the IDF go? In a common area, right?

A. No, the IDF is in our non-common area.

Q. So how do we get test access to a splitter that's located in an area we can't access?

A. No, the terminations are mounted on the IDF. The splitter itself is mounted in the common area. And you have test access at the splitter, not at the cross connections on the IDF.

Q. My question didn't even talk about IDFs, your answer did. I said is it possible, is it possible that Ameritech could put splitters, not terminations of splitters, but splitters themselves in locations that are inefficient?

MR. PABIAN: I'll object, Your Honor. That's a vague question. Inefficient by what standard?

MR. BOWEN: I'll amend the question to say inefficient by engineering standard, central office engineering standards, is that

possible? That's not vague. There are engineering standards in central offices. I've read them.

MR. PABIAN: Okay.

Q. Can you answer that question, Ms. Schlackman?

A. Yes, I can, and I do not believe that putting splitters in a common area is an ineffi cient engineering practice.

Q. Well, let's say you had a four story central office. You have some of those in Illinois, right?

A. Yes.

Q. Multiple story central offices.

A. Yes.

Q. If you decided to put the splitters -- well, let me back up. The MDF will be on the first floor normally?

A. Not always, but traditionally, yes.

Q. Okay. And where will the IDF be?

A. Adjacent to it.

Q. On the first floor?

A. Or it could be on multiple floors

depending on how big the office is, but typically in Illinois offices, it's on the same floor.

Q. What if you decided to put the splitter in the back corner on the fourth floor? Would that be efficient?

A. If the back corner of the fourth floor was directly above the frame, that's not a whole lot of cable distance if you were directly above it.

Q. What if you decided to place the splitters on the fourth floor in the opposite corner from directly above the frame? Would that be efficient?

A. Well, in terms of being efficient, efficient to what?

Q. Considering all the factors the central office engineering considers when they place equipment.

A. Well again, we are placing the equipment in an accessible location as close to the frame as possible, so within the common area, our guidelines are, that they do place it as close to the IDF as possible in the common area.

Q. So I take it from that answer that you believe that a placement of an ILEC owned splitter on the fourth floor, the farthest possible distance from the frame could be efficient? Is that your testimony?

A. Well again, I don't know what you determine to be inefficient about that.

Q. I'm just asking. Could that be efficient in your view?

A. Yes.

Q. Will you agree that -- strike that. You've heard the term TELRIC, have you not?

A. Yes.

Q. Do you understand what that means?

A. Yes.

Q. You understand that to be the standard that the FCC currently mandates for pricing purposes?

A. Yes.

Q. Do you understand TELRIC to have an efficiency assumption or component to it?

A. I don't know enough about the components, other than I know the phrase that's always used is forward looking network.

Q. Would you agree that the cost and pricing under TELRIC can result in studying a different configuration than you actually deploy?

A. Yes.

Q. All right. Let's talk about some more about frame exhaust. Now, one of the assertions you're making is that if this Commission required Ameritech to place Ameritech owned splitters on the MDF, that that could lead to frame exhaust? Do I understand your testimony correctly?

A. Yes, that is correct.

Q. Okay. Have you done a survey in Illinois about the percent capacity utilization of main distribution frames for central offices?

A. No, I haven't done a study of the percent utilization, but I will say that, in Ameritech, Ameritech doesn't place any ancillary equipment, even their own, on a main distribution frame if an intermediate distribution frame is available. In other words, we save the main distribution frames just for working service. That's the difference between a mainframe and an intermediate. In an intermediate

frame, all of your CFA cable, all of the splitters, everything is tied down and the distribution frame -- that's what an IDF is for, is for terminating all of the equipment. The main frame, on the other hand, only contains working circuits, or ideally that's where it should be, so what we do is, we plan for any office that would exhaust in five years, we plan an intermediate distribution frames in those offices to avoid exhaust, so, you know, that's the whole purpose of the planning cycle, is to avoid the exhaust, and not get to the point where you have to have an exhaust to the main frame.

Q. That was a long answer. Let's talk about that answer. Well, I take it that if there were always the case that an IDF was the way to go, that we'd see a hundred percent IDFs already deployed in Illinois, right?

A. That's the way we are growing. We're up now to almost 80 percent IDFs. It was 60, and they had planned by the end of this year to be at 80 percent IDF in Illinois, and eventually it will be a hundred percent, because that is our architecture

going forward.

Q. Gee. I thought I saw a data response from your company that said you were at 60 right now.

A. We are, but I said by the end of the year, they believe that they'll be at 80 percent.

Q. You were in the Texas arbitration, weren't you?

A. Yes.

Q. Do you recall GTE Horizon saying they use no IDFs in their central offices in Texas?

A. No.

Q. Let's assume that they did say that in Texas. How can it be the case that one ILEC who has access to the same data that -- or the same equipment that another one does, one decides that an all IDF configuration is efficient, and another one decides that no IDF is efficient?

MR. PABIAN: Your Honor, I'll object to that. That assumes facts not in evidence.

MR. BOWEN: We had the same -- Mr. Lube -- and he agreed to that testimony.

EXAMINER WOODS: A: I understand

it's hypothetical, and B: She can answer if she knows.

MR. PABIAN: As a hypothetical?

MR. BOWEN: Sure. We can do hypothetical.

WITNESS SCHLACKMAN: Well, as a hypothetical, I'd say that -- let's just say that GTE had almost all COSMIC brains, so...

EXAMINER WOODS: Would you spell that?

WITNESS SCHLACKMAN: C O S M I C.

EXAMINER WOODS: Is it all caps?

WITNESS SCHLACKMAN: Yes, all caps.

EXAMINER WOODS: Is that a brand, or...

WITNESS SCHLACKMAN: No, it's a type of frame that we used back in the 70s, and if they had COSMIC frames, those are modular frames, then they would have a COSMIC frame for their SWITCH ports, and then they would have what they call their main distribution frame that handles the cable going out to

the end-users. They tie cable over from their COSMIC frame and we do too when we have COSMIC frames, over to the main frame, but in that instance, you have two frames as well. You can call the main frame, if you want to, an IDF, or you can call it COSMIC frame. You've got an intermediate frame other than the mainframe, and I don't know that all GTE, for all I know, has all COSMIC brains, and if that's the case, then they have SWITCH ports on one frame and they have their main frame with their cable terminations on it. We have that as well, and we also have IDFs, so...

Q. You're not testifying to what you know, you're testifying what you're speculating about GTE?

A. You asked me.

Q. A hypothetical of a company named Horizon Texas, just hypothetically, is there any other reason you can think of why an ILEC, besides a COSMIC frame, would decide that it did not want to use an IDF configuration?

A. I can't imagine why they wouldn't.

Q. Okay. You say you do use COSMIC frames?

A. Yes.

Q. Do you have COSMIC frames in Illinois?
A. Yes.
Q. And are those wired, as you just testified, to a secondary frame?
A. Yes.
Q. Which, as you said, is an additional frame like an IDF, right?
A. Well, it is the main distribution frame where it's wired to. It is called the MDF.
Q. Do you know what percent of your offices in Illinois have COSMIC frames?
A. No.
Q. I take it you'd be okay with putting frame mounted splitters on the net configuration, right?
A. Frame mounted splitters on a COSMIC frame?
Q. No, not on a COSMIC, on the secondary frame.
A. If there was no other frame I would, yes, but if there was another frame, I wouldn't, because eventually the COSMIC frame, that's an older style of

frame, and you would migrate off of that as you upgraded equipment, and you'd be evolving out of COSMIC frames.

Q. All right. So you don't know what percent in one office or what percent on average all offices are in terms of frame capacity? I think I said that right.

A. Yeah, that's correct.

Q. Now, you've been in the central office I know.

A. Yes.

Q. It's normal to have the main distribution frame run a long, in affect, one of the walls; is that right?

A. Yes.

Q. Instead of being in the center of the room?

A. Correct.

Q. And it's also normal to only build the number of frame segments that's required to meet some anticipated demand over some time period?

A. Correct.

Q. And so you leave some space at the end of that line for future growth, right?

A. Well, I don't know that the -- I mean, when the frame was built -- when the frames are built, I mean, they're constantly being added on, so it's not like you build it and then leave space. When you get to the point where you need more space, then you build on or add another frame.

Q. In other words, you have the long wall available to you to build the first part of the frame based on the demand that you have at that time and then some growth, right?

A. Well, on the intermediate --

Q. No, the MDF.

A. MDF?

Q. MDF.

A. No. We are limiting the expansion on MDFs by deploying IDFs, so again, equipment that's not being used, that's not connected via service order actually in use, it wouldn't need a termination on our main frame such that we wouldn't have to have main frame exhaust.

Q. I understand your position, Ms. Schlackman. I'm asking about what you actually do in your central offices. You don't take the entire linear distance an MDF could occupy, and build it from day one, do you?

A. I haven't been in an office that's been built since day one, so...

Q. Well, have you been in any offices where you see unused available space at the end of the current MDF line?

A. And I've been in more offices where there's no available space at the MDF line up, yes.

Q. Could you just answer my question? You can clarify if you need to. You have been in offices where there is space at the end of the current MDF for growth, right? Yes or no?

A. Well, no. I don't know that. Sometimes it's in the middle or it's at the bottom or at the top, but it's not necessarily at the end.

Q. Fine. Have you been in offices where there is space available for growth of the MDF, whether it's at the middle, or the bottom, or the top

or at the end? It's not a trick question.

A. I -- you know, when I've been going to the central office and looking at the splitter equipment, I typically concentrate on the IDFs and what we have mounted there, so I can't really answer your question. It would be speculation on my part. I didn't pay that much attention to the MDF as much as I have the IDF.

Q. Okay. Well, when you talk about the frame exhaust, let me ask the question this way: Are you talking about exhausting the space available on the current configured MDF, or are you instead talking about exhausting the space that might be available if you were to grow the MDF to full capacity?

A. I'm talking both.

Q. Well, you're talking here about a risk that you think would be present and serious if the Commission were to order you to place splitters on the MDF; isn't that right?

A. Yes.

Q. So how near is that risk?

A. Well, again, the equipment is our

equipment, and we're placing it in our office so that we mitigate any risks of having frame exhaust, which is why we want them on the IDF.

Q. That wasn't the question. I know what you want. I want to know what happens if the Commission orders you to do what you don't want to do, which is to put splitters on the MDF.

A. Then we're going to have a lot more costs and exhausted MDFs.

Q. How do you know that?

A. Because that's what happens when MDFs get exhausted. You have no space to go, you have no walls to kick out, or you're talking a huge building change.

Q. How can you reach that conclusion if you've done no survey of your current capacity of MDF?

A. I've been in offices that are at MDF exhaust. I've been in many offices that we're rebuilding because of MDF exhaust, and that's just not because of CLEC equipment, that's because we have more lines, so we're building the frames to accommodate all of the lines. We do not need the MDF to have every

appearance of everybody's equipment on that MDF. We can handle it on the IDF and use the MDF and preserve it just for working service.

Q. But if the Commission orders you to put -- to allow splitters be put on the MDF, and I've been in offices that allowed that, that could be done, right?

A. Yes.

Q. Okay. Now we've heard from Mr. Lube about the effects of Project Pronto on your network configuration, and you have some testimony about the deployment of DLC equipment on the issue of frame exhaust, right, on page 22 and 23?

A. I guess I do.

Q. Okay. And we've heard from Mr. Lube, and I think you were in the room today when he was testifying in response to this counsel's redirect examination that the copper network will still be out there, I don't want to dispute that with you, what I'm going to try and figure out is whether or not -- I mean, throughout history until recently, as you added lines on an all copper configuration, you need

to add frame appearances on the MDF, right? That's how it works?

A. Yes.

Q. And if it's on non-carrier system kind of connections, it's one more, when you add a new customer out there, you have to add an appearance on the vertical side of the MDF, right?

A. Yes.

Q. And when you move from that into carrier system, that changed somewhat in terms of line for line, right?

A. Correct.

Q. Now, UDLC, Universal Digital Carrier Systems, come in and end up with an appearance on a DSL level or voice grade level based on the MDF, right?

A. And we place them on the IDF.

Q. On the IDF, okay. So, as you moved from all copper configurations to DLC systems, is what you're saying that you terminate the appearances on UDLC configurations on the IDF?

A. When you say when we move from copper to

the carrier system --

Q. When you moved from non-carrier systems to carrier systems, in particular, universal DLC systems, do those pairs or don't they terminate on the MDF at some point?

A. No. Well, no, they don't terminate on the MDF at some point. The copper pairs will still stay there on the MDF, and the D00 terminations will be terminated on the intermediate distribution from the IDF.

Q. And so you have right now a voice customer being serviced by UDLC. Are you with me?

A. Yes.

Q. That terminates on the IDF; is that right?

A. Yes.

Q. And then if they have voice, the connection goes from the IDF to the voice SWITCH?

A. Correct.

Q. Doesn't touch the MDF?

A. Unless there's not an IDF in the office, and then those connections are on the MDF.

Q. Sure. The IDF terminates from UDLC on the IDF?

A. Yes.

Q. Now, what about next generation DLC equipment? In fact, that deployed Project Pronto. You've got copper pairs in the fields, they come in through the SAI into the copper, into the remote terminal, on to the fiber, and let's assume we're talking about here again about the POT side of the DLC, where do those pairs terminate? Where do those DSLs terminate? Is that on the MDF or the IDF?

A. There's two types of deployment strategies in Illinois. Part of NGDLC will be using integrated digital carrier, so there won't be an appearance on any frame unless a CLEC wants to have an unbundled switchboard, and then we will provide however many cross connects, you know, however many appearances we need to provide, but it wouldn't be a one-to-one, so an integrated digital carrier you do save the blocks on the frame totally and just plan for those that you think you're going to sell on an unbundled switchboard, and then for UDLC, where you

actually have to terminate all the D00s, then yes, those are all terminated, terminated on the IDF.

Q. All right. But the integrated digital carrier comes into the SWITCH itself at an T-1, right?

A. Right.

Q. 1.5 megawatts per second?

A. Well, I mean, it comes into the office on an OC-3.

Q. I know.

A. It breaks it down to a DS-1.

Q. Okay. And comes into the SWITCH directly then, right?

A. On IDOC.

Q. Yes. Okay. So neither of those technologies uses any MDF capacity at all, right?

A. Again, if we were -- if we did not have an IDF, we would, but we don't plan for them to.

Q. Again, let's assume that you had an IDF in the office, for this discussion. If you had one, you're going to terminate UDLC and IDLC on the intermediate distribution frame, and from there to the SWITCH if it's a voice service, and to a collo if it's

a known group, right?

A. That's my understanding, right.

Q. Neither of those touches the MDF at all?

A. That's my understanding.

Q. All right. But you're going to leave up the home run copper you have in place right now?

A. Yes, that's my understanding.

Q. And you may also, at least if Mr. Lube was correct, you may also be adding at least some copper growth pairs with MDF terminations near the central office where you wouldn't put a DLC in the first place; is that right?

A. Would we be adding copper terminations?

Q. Yes. If you have a customer that's 2,000 feet from the central office or a series of customers, would you be serving those with new copper?

A. Yes, if there was no copper to rearrange. I would just assume that if you had all of these NGDLCs, that you could bring back some copper and wouldn't have to place any copper, but assuming it's all used up, and you've got customers that are a few thousand feet from the central office, you're going to

place copper.

Q. But could you use some freed up copper to serve those on a rearrangement basis as well?

A. Yes.

Q. Okay. Why don't you keep the last colloquy in mind here. It seems to me that in terms of vertical appearances on the MDF, that the growth is pretty much peeked; that is, you've moved away from a home run copper serving technology, and deployed UDLC and IDLC and NGDLC in both of those configurations, all of which no longer involve the MDF at all, so it seems to me -- well, I want to get your comment on this, would you agree that the growth of copper usage of the MDF has peeked?

A. You know, they're all economic decisions, and I don't know that you would make that same decision. If you were in downtown Chicago, you might say yes. If you were in another area where putting in more digital loop carrier would not, you know, cost certain amount of money, say it's $500,000 and all you have is 300 customers out there, the economic decision is going to be that the engineers are going to have to

place copper. They're not going to always place digital carriers out there unless they can substantiate the growth, so it's really an office by office situation.

Q. Okay. Fair enough. But isn't it true that all of the deployment will add zero additional demands to the MDF?

A. On the vertical side, that's true.

Q. Okay. On page 23 of your testimony, your direct testimony, I wasn't quite clear on one of your methods here. On line four you say: 40 percent of Project Pronto DLC is planned to be deployed as Universal DLC. Do you see that?

A. Yes.

Q. Is the rest IDLCs, or is it split up between IDLC and GR303 NGDLC?

A. My understanding is the rest of it's all IDLCs. 60 percent is IDLC?

Q. You've heard of GR303, have you?

A. Yes.

Q. You understand that to be a specification that allows channels as small as 64 kilobits to be

derived and handed off to the central office terminal?

A. Yes.

Q. So you don't need to go in as IDLC if you have GR303 compliance, right? You can give CLECs like 64K or voice grade loop using NGDL equipment,with GR303 compliance?

A. I don't know that.

Q. You don't know that. Okay. Let's talk about testing and test access, and for reference, your testimony starting at page 27. And here you have five numbered test things that we can do for line sharing; isn't it?

A. Yes.

Q. One of those is to use your mechanized loop test, or MLT, vehicle. Do you see that on page 28?

A. Yes.

Q. Okay. Now, this is a test vehicle that's run from the SWITCH; is that right.

A. Yes.

Q. And I want you to keep in mind the configuration, first of all, when you own the

splitter, think of all the tie cables and all the jumpers, and all the paths the signals go down. I know you know this because you got a picture of this in your testimony. You got two pictures. All right. When you own the splitter, I want you to tell me if we run an MLT, and you might want to refer to the picture, I don't know, what path is being tested? From where to where?

A. Where are you running the MLT from?

Q. I want you to tell me that. Where is it possible to run it from? The SWITCH generates the signal, right?

A. Let's start with the end out here on the right-hand side.

Q. Are you on a picture?

A. Yes.

Q. Which one?

A. Look at the first exhibit.

Q. Schedule BS1?

A. Yes.

Q. On your direct testimony?

A. Right, and the lower right-hand corner

where we have the cable pair. Then that goes out to someone's home or building.

Q. Okay.

A. And at that building, is what is called a network interface device, a NID, N I D, and an MLT test could be run from that network interface device, and you could test --

Q. How do you generate --

A. Well, I take that back. I'm thinking there's just normal test access.

Q. I'm talking about --

A. You would test -- I'm sorry. Strike that. I was thinking of just normal testing. You could do any kind of testing on the NID. Okay. So for MLT test --

Q. Right, this is a component of your SWITCH?

A. That's true.

Q. Loosen and Nortel -- actually, it's just Loosen provides an MLT, right, service or functionality, right?

A. That's part of the testimony, yes.

Q. Let's assume that they both offer something called an MLT, that's run from the SWITCH, right?

A. Yes.

Q. And look at the paths that you have here. Where is the SWITCH on here?

A. In the lower left -- well, kind of like the dead middle in the diagram where it says Ameritech ESS.

Q. And ESS means?

A. Electronic SWITCH. It's class five SWITCH.

Q. Okay. That's that little box in the middle where the arrow points to, right? That's where the SWITCH is? No, it's over here. I'm sorry. It's below that.

A. Okay. So the MLT test is run, it's initiated --

Q. From the switch?

A. From the SWITCH, right. The MLT is going to look at the entire continuity of the loop where the voice is and test all the wiring, however it goes

through the office, and out the cable pair, out to the network interface device, and it tests up to the network interface device.

Q. So it tests from the voice SWITCH and the direct path through all of the frames and jumpers and tie cables, out the loop plant to the customer premises, right?

A. Correct.

Q. I take it that it doesn't test back towards the splitter and back towards the CLECs collocation; is that right?

A. It wouldn't test back to the CLECs collocation, but it would test to the splitter because that's the path of the voice, so you'd be checking the continuity if any of those wires were open or damaged and then you would get a shorter and open test on MLT.

Q. And what MLT test -- it knows that it has found -- if the test is successful, it has found a good circuit to some NID, right?

A. Yes, and you should see some kind of signature on that that tells you how many feet out you have, that the line is balanced and that kind of

stuff.

Q. It doesn't know that it's gone to a particular address, necessarily, right?

A. No.

Q. Okay. You can find out a different way. An MLT test just tests the ID that you tell it to test, right?

A. Yes, and then you can see the ringers there so you know you're getting a full test because you can look at the ringers and know you're testing all the way out to two telephone tests.

Q. Two way location in the field someplace?

A. Where sets are terminated on equipment, yes, because it sees the signature, gives you a signature of what those telephone sets look like in terms of the test group.

Q. Okay. But if you look at the same page here, it doesn't -- you see the connection that goes back from, let's look at where you are on the splitter on the next page. This is Schedule BS2. Do you see the little box that says Ameritech POT Splitter?

A. Yes.

Q. All right. The MLT does not test the data only portion of that circuit; is that right, coming back from the splitter to the IDF and then from there back to the CLECs collocation?

A. That's correct.

Q. So it tests the voice path?

A. Correct.

Q. So if the trouble's in the voice path, and the MLT has the right line to be tested, it will pick up the trouble? That's number one here, correct?

A. Correct.

Q. Number two is using the Automatic Number Identification, or ANI test, right?

A. Correct.

Q. And what that tests, if I understand this correctly, it says, okay, here's a wire pair, I can tell from this what telephone number that wire pair germinates on; is that right

A. Yes, it will give you the telephone number that's associated with that wire.

Q. So you know -- if you know the telephone number of the line you're trying to test and you do an

ANI test and it comes up with the right number, then you know you're testing the right line?

A. Correct.

Q. And how does the ANI test work? Is that from the SWITCH as well?

A. No, that would be from a hand set that the technician would carry, you'd clip on to the tip and range of the pair and dial the code number a nd then a machine voice response system comes back on says: The number is...

Q. Okay. And then number 3 is an high frequency test at the splitter, right?

A. Yes.

Q. Now what path does that test?

A. That test, you'd be looking as if you were at the cable pair on the far right side.

Q. On which drawing now?

A. Of either one of them, so you're on the line side, the cable pair of the line side of the splitter at that point, and you can look out at the loop and you can see the entire, you know, your high frequency, and you've seen them on the test sets on

working lines, DSL lines, that the technician can see that he's got the frequency range that he's looking for, and he knows that he's got a good test. And now they also can test them at that point with test signals from their Internet service provider, so it really can almost be like a two way test, but I suppose the CLEC would probably do that at the DSLAM.

Q. What I'm trying to figure out now, after you are said all that, of all of these tests, which of these tests -- I want to make sure that you're offering us a test that let's us test just the basic copper connection between our collocation arrangement and your splitter, because I think I understand that the MLT will test the voice path, but I haven't heard you yet say what test you're offering up to us that lets us test that copper tie cable from the collo over to the block on the IDF and then the jumper across to the appearance from the splitter.

A. Yes, that test that I just described when the technician has his test set, he wouldn't see any frequency range when he got on there. If he -- if the wiring from the DSLAM to the frame back to the

splitter, if that was not properly done, he wouldn't see a signal at all.

Q. Okay. So this is a test when there's a live high beam signal coming across that pair, you need that to do that test; is that right?

A. Well, yes.

Q. But it's possible to check just for basic continuity, continuity and connections, even if the piece that comes back from the CLECs collocation arrangement to the appearance and the jumper across to the tie cable coming across --

A. Yeah. Let's just -- yeah. For instance, if the CLEC wanted just to be sure that their cable was -- wire was running right, they could put a tone on their CFA pair on their cage and go to a splitter and pick up the tone.

Q. And you'll let us do that?

A. Uh...I take that back. You wouldn't be able to do that unless it was wired. You could test that after it was wired before you put your tone, before you put your high frequency signal on there, but we wouldn't wire it. You wouldn't be able to test

at the splitter until you had given us a service order, so, I mean, either way, you don't have to put your signal on there or you could just test for wire continuity if that's what you chose to do.

Q. And you'll let us do that on your proposal? When you own the splitter, you will let us test that continuity from the DSLAM back to the splitter?

A. You should be able to have your test set pick up your signal, yeah, sure.

Q. Okay. Thank you. Okay. Let's look at page 29 and 30. The issue here is intrusive test access. And here on page 30 of line -- about line 5 and 6, you're talking about your proposal would let us perform what you call intrusive testing if we have the end users permission. Do you see that?

A. Yes.

Q. Do you mean written or oral, or what?

A. Oral. You would write it down then on your work order.

Q. I want to understand what kind of permission or evidence of permission you're suggesting

we need to get to satisfy your proposal here.

A. Oral.

Q. Oral, okay. Now, is an MLT test an intrusive test?

A. Yes.

Q. Is that because it takes the circuit off line basically to run the test and then puts it back on again?

A. Yes, and not every MLT test is an intrusive test. In fact, before, if the customer were on the line and you wanted to initiate a test, it's going to come back and say busy speech, so when we say intrusive, that means that if you were running the test in the frame time that you were running the test, then the customer wouldn't be able to get dial tone while you were running the test.

Q. I'm with you, okay. Now, you're proposal here is that, starting at line 6, is that we have to assume any and all liabilities, it's a bunch of lawyer words here: Liability, indemnify you, and that kind of thing. What I want to know is, in a line sharing configuration, Ameritech's going to have

service up to the POTS voice service, right?

A. Yes.

Q. Now, do you want to be able to run MLT type tests on the voice service if you get trouble?

A. Yes.

Q. And I take it then that you're going to indemnify us and hold us harmless and all that kind of lawyer stuff if your MLT test hurts our data, right?

A. Well, let me say that the reason why this is here, first, is that the customers that have voice service expect their voice service to be up, and they expect us to be their voice provider. They need that voice service for emergency services. It's their lifeline. Why we wrote this language in there is because you do have test access, and it's not just MLT, you could put a tone on the line anywhere at the DSLAM or the ISP, you could have your pilot tone up, and it would -- the customer would have no dial tone. You might not even know that you have that up, and what we're saying is that if you're going to be testing, if it's just going to interfere with the low frequency of the loop, it doesn't interfere with the

low frequency portion of the loop, fine, but because the customer expects to call fire, emergency, and might have some, you know, lifeline services here, that we want to be held harmless should any of your testing either, a) ruin our equipment; or b) cause the customer to sue us because the house burned down, they couldn't get 9-1-1, let's just say --

Q. I understand it quite clearly. What I'm asking is, is turnabout fair play? Are you agreeing that you will also indemnify us if you do an intrusive test on your part of that line share loop?

A. Now, this is not my part. I have the loop. The loop is mine. And I understand that you don't even want to pay for the line share portion of the loop, so the loop is mine, and the customer does look for me --

Q. You're going to be here a long time, Ms. Schlackman, if you want to talk about the pricing of loops. A long time.

EXAMINER WOODS: Is the answer yes or no? Are you going to indemnify them if you interrupt their high speed?

WITNESS SCHLACKMAN: No.

MR. BOWEN: Thank you.

BY MR. BOWEN:

Q. And if you run an MLT, that will interrupt the DSL service, won't it?

A. Yes.

Q. Okay. Let's talk about loop conditioning on 31 and 32. You're proposing to remove load coil repeaters and excessive bridged taps at no charge for loops less than 12,000 feet, right?

A. Yes.

Q. So if I understand that correctly, if there aren't any such devices on loops below 12,000 feet, for example, if you had a couple load coils, you're going to go out there and pull them off and not charge us for them?

A. That's correct.

Q. Why?

A. That's what we agreed to in the SPC Ameritech merger.

Q. Why did you agree to that?

A. I wasn't there. It was a negotiated item.

Q. The work efforts that you'll be doing to do that is not in your perspective free, is it?

A. No, it's not.

Q. But you want to charge us to do the same work efforts for loops longer than 12,000 feet, right?

A. Well, I'm saying that doing it at less than 12,000 feet was a negotiated item, so there were some puts and takes with that negotiations, something was gotten, something was given up, but for loops over 12,000 feet, we will charge to recover our costs, yes.

Q. So your proposal has nothing to do with any kind of engineering or any other kind of parameters, it simply is a result of negotiation to get the merger conditions? Is that your testimony?

A. No. And I would say this, too, that we wouldn't anticipate very many loops under 18,000 feet to have load coils.

Q. Do you recall my question? I'm asking you whether there is any engineering basis to differentiate 12,000 feet, and say below that I won't charge you, and above that I will.

A. No, not to my knowledge.

Q. Okay. Let's look at page 33. Here you're talking about why you think there might be load coils on loops less than 18,000 feet. Do you see that?

A. Yes.

Q. And the first reason you put forward is that for some kind of loops less than 18,000 feet, you need loads and you reference certain PBX services. Do you see that?

A. Yes.

Q. On line 17?

A. Yes.

Q. Are these what is known as a shared PBX trunk?

A. I don't know. I've never heard of that terminology.

Q. Have you ever heard of 5 or 5.5 DB loop?

A. Yes.

Q. Is that what you're talking about here?

A. Yes, or even five DB loops that we engineered two point loading to achieve the DB loop.

Q. Well, I want you to take yourself back to

a time before there was DSL, okay, real dark ages. What was the practice of Ameritech at that point, in terms of once you had loaded a PBX, a shared PBX trunk, and that customer went away, what was the practice? Did you leave the loads in plays, or did you take them off?

A. Well, typically, the practice that's in place today --

Q. No, I didn't ask about today, I asked you about back then.

A. Back then before there was DSLs?

Q. Right.

A. Then the outside plant planner that has the wear center, when they are looking at their plan, they look at it, I think it's every three years for feeder, I'm assuming we're talking about loaded feeder.

Q. I hope so.

A. So, if we had loaded feeder cables in a route, and let's just say it was a big building and they moved away, went to Texas, and now there's a big building there and there's nothing left, and then the

outside plant and planners job would be to redirect those cable pairs, and what they do is they commit, say, let's just say it was a 900 pair cable, and it was all loaded, for instance, and then they would redirect maybe 200 pair of the cable to a box that was less than 12,000 feet.

Q. Okay.

A. And within that direction, then they would have Ameritech Illinois engineers issue the job and removal of the load coils, and they would bring that up to the engineering resistance zone standards for that facility. Now, let's just say that part of that cable went on out into the country and that the engineer decided he wanted to take, you know, 200 of those pairs and leave them loaded to serve long route, so it was really the outside plant and planner recommits the cable pairs, and when he's done recommitting them into an area, he'll do the design such that those load coils would get removed.

Q. Okay. That's fair enough. Let's take your example about reusing 200 pairs to serve a location that's less than 19,000 feet, it doesn't need

a loader, okay? What you're saying is that if that building or the customers went away, in terms of PBX trunk service, and the loads weren't needed it would have been the normal practice of the company even at that time, to deload those pairs and serve other locations that were less than 19,000 feet from the CO, right?

A. And the only --

Q. First say yes or no.

A. No. And the only part of that I would disagree with is that, let's just say that that factory that went away was 17,000 feet from the central office and there was bridged tap on the cable, and we could still reuse the cable facilities with the three point loading just as it was without making any changes, the engineer would not make all of those changes. He would only make them if he was recommitting pairs to the different area, then we would bring it up to standards.

Q. I'm with you, okay.

A. I'm just saying that, yes, there's going to be instances even in rearrangements where some of

the cable could be loaded, but then again, you're still going to have all your resistance design rules will be satisfied, and you'd still have your end section that you required, and you wouldn't have customers working between loads and all those engineering rules when that planner maps out what he wants to do with that cable.

Q. But the only reason these loads were here in this hypothetical was to serve this assured PBX trunk, right?

A. And I'm not sure that there weren't other services that they used some loading for circuits, I'm not real sure that that's the only one, but I do know that that is one.

Q. Well, it's your example.

A. Right, it's my example. I'm just saying I don't know of all the other examples of less than 8 DB loops that we engineered two point loaded for.

Q. Well, let's just talk about the PBX trunk. The only reason those loads were there was to decrease the DB loss to give the customer an assured PBX trunk, right?

A. Yes.

Q. Okay. And what you're saying is, under some conditions, if that customer goes away, you might have pulled the loads off and the conditions you described and others you might leave them in place?

A. Yes.

Q. All right. What's the practice now? Do you have an assured PBX trunk now that goes out of service or a series of them? What is your practice now given that you know the digital services, including those provided by your affiliate need to have -- is it still the same practice or not?

A. Yes, we still have the same practices in place today, such that if that same scenario, we had 200 pairs, let's just saying they were still loaded because they were still useful and they were serving voice services over them and there wasn't any high concentration of anything going on, then they could make the decision to leave those just as they are, yes.

Q. Didn't customers pay more for those shared PBX trunks back then than regular trunks?

A. (No response.)
Q. You don't know?
A. (Witness shaking head no.)
Q. Later on down that page you talk about other changes including DLC deployment, that where you might still have loads because of that deployment, right?
A. Yes.
Q. And what's the practice there? What was the old practice there? When you deployed the old DLC, did you deploy a load from the pairs that were now shorter than 19,000 feet?
A. Typically, what we did was the same thing, and even in like an rearrangement, where a new central office or so much growth out there that you have a central office out, and so now I take the existing cable facilities and you're going to like have a cutoff period and you're going to move and migrate these certain loops over to this new central office and leave these loops to this central office and it could be in those rearrangements, you've got some very long load cables because they fit the

original central office, it was a very long route, and now you've got loaded cable that is now being used and honed into a small area, and as long as those were voice services over that, worked fine, we would leave the loaded cable where it was. Anything else that we recommitting to new area, then we use the resistance zone design, and yes, they would call for the load coils to be removed.

Q. Okay. Let's look at page 34. And your testimony here is that load coils don't hurt any load grade services on loops that are less than 19,000 feet, right?

A. Providing that, you know, that the proper engineering standards were done with the loop. You didn't put a customer between loads.

Q. Well, what about -- isn't it correct that analogue modems are affected by the load coils?

A. Oh, yes. There's a lot of things that effect analogue modems.

Q. You can run analogue modems on regular voice based loops? People do that, right?

A. Right, but if you're like a digital loop

carrier, you're going to have the same kind of problems. You'll have slower speeds on analog ue modems.

Q. Well, let's just focus on all copper loops at 18,000 feet or below, okay?

A. Okay.

Q. Not DLCs, not fiber.

A. Okay.

Q. Isn't it correct that if there were load coils on that loop, you will get lessor performance from that analogue modem than if there weren't loaded coils?

A. Well, again, we design our voice based service at an eight DB loop, and I can't guarantee what frequency or any other kind of equipment. What we guarantee is what's in our tariff.

Q. I'm sure that's true. Now, do you recall my question?

A. I answered your question.

Q. Let me try it again. Isn't it true that analogue modem performance on a loop that's loaded which is less than 18,000 feet is lower than analogue

modem performance on a loop that's not loaded?

A. Yes.

Q. Okay. In terms of repeaters on the bottom of that page, you're not talking about what are known as AMI T1 on an alternate T1 line, are you?

A. I'm not familiar with that. I wouldn't be talking about that.

Q. Okay. What are you talking about here? What kind of T1s are you talking about?

A. I was really talking about two different kinds. I was thinking of like a T1 band we used to build that spanned that digital loop carrier. We would put it on a T1, and we would have repeaters cut in on regular intervals for that T1, as opposed to a data service, a 1.54 data service, where you would have some repeaters on that loop, however long the loop was. Then there would be repeaters cut in on those particular pairs just for that data service. Those are the two difference I was trying to dr aw.

Q. Fair enough. What about bridged tap on page 35? Have you heard of the term non -interface plant design?

A. Yes.

Q. Does that essentially mean a design that uses bridged tap as opposed to the SAI crossconnect kind of architecture?

A. Tell you what, it's been a long time since I went to engineering school and a long time since I've worked with non-interfaced plant, so I really don't remember the engineering rules for non-interfaced plants.

Q. Well, isn't it true that when serving interfaces or cross boxes or feeder distribution interfaces were replaced, it removed the need for some bridged tap?

A. Well, we still can have up to 6,000 feet bridged tap.

Q. Do you recall my question? Isn't it true that when Ameritech Illinois and our box begin to place cross boxes, it removed the need for some bridged tap?

A. I don't know that.

Q. You don't know that, okay. Do you know whether Ameritech Illinois still uses non-interface

plant designs?

A. I don't know.

Q. Let's talk about page 45 where you start talking about fiber-fed DLC systems. Now, I take it that Mr. Lube is the prime witness on Project Pronto; is that fair?

A. Yes.

Q. But you do say a couple of things about it yourself, don't you?

A. No, not about Project Pronto. I was just really referring to where we have traditional additional carriers, they buy fiber. The testimony that I address is just traditional fiber-fed digital loop carriers.

Q. So is it possible to line share over traditional DLC systems?

A. Line share on the subloop, yes.

Q. How about over the fiber?

A. No, there's no line sharing over fiber optics.

Q. Well, I --

A. I mean, they're different fibers even.

You wouldn't use the POTS fiber to transmit your data as well. That would be destined for the packet SWITCH.

Q. What I'm trying to understand here is, and we went through this with Mr. Lube in some length yesterday, and we understand the company's position on this issue about what line sharing is and is not, so I'm not going to go over that with you again. I'm trying to understand you said your testimony deals with DLCs that are not Pronto. Did I hear you correctly?

A. Well, I address that, yes.

Q. Is the party testimony beginning at page 45 limited to DLC systems that are not Project Pronto capable or not?

A. Well, no. I mean, I'm referring to the FCC decision on whether or not providing xDL service in that decision in on Pronto, so in that particular instance where I'm talking about the first question, I would have to say that that's a more general question over fiber-fed DLC period.

Q. Let's go to page 48. We're still on the

same topic, right?

A. Yes.

Q. And here you're saying, and again, we know about the Broadband service offering, we've talked about that, your paragraph from line 7 to 20 deals with that Broadband service, right?

A. Yes.

Q. And I take it you, like Mr. Lube want us to buy the Broadband service?

A. I'm sorry?

Q. You, like Mr. Lube, want us to buy the Broadband service?

A. Yes.

Q. Now, look with me at the very bottom of that page, please. You talk about negotiations between a CLEC and Ameritech Illinois. Do you see that?

A. Yes.

Q. And the last sentence, I'm approaching here, I'm going to quote you here: If negotiations fails, parties should pursue arbitration at that time, pursuant to the requirements of Section 252. Do you

see that?

A. Yes, I see that.

Q. And that's your recommendation, I take it, that we should try and negotiate, and if we can't, then we go, as you suggest, here.

A. Well, we had some discussion about that at lunch time, and my understanding of that ruling was incorrect and I was corrected at lunch, that that is not the vehicle of service offering, and I didn't get into all the ins and outs of it, but I was corrected at lunch, or I was informed.

Q. You said weed a discussion at lunch. You don't mean you and I did?

A. No.

Q. Who?

A. My attorneys and myself.

Q. And they told you you got it wrong here?

A. Well, actually, we were talking about it, and then it was just high level, and we were talking and they got into a lot of talk between themselves, and there was discussion on it, and when I left, I knew that what I had addressed, or what I thought was

to be is not the way it's played out, but I didn't pay attention and it was too much activity in a 35 minute lunch to keep up with all the legal issues of what they were talking about.

EXAMINER WOODS: Why don't we see if counsel can clarify?

MR. BOWEN: I just want to know if the witness' testimony is written, she didn't propose any modifications to her testimony.

EXAMINER WOODS: That's why I asked counsel to clarify if possible. Can you tell us what's going on?

MR. PABIAN: Well, the witness' testimony as indicated here is not correct.

EXAMINER WOODS: And what should it be?

MR. PABIAN: It should be that the provision of the service is a negotiated item between carriers, but it's outside the scope of 252.

MR. BOWEN: Shucks. I was hoping that we had a uni here, Ms. Schlackman, because under this part of the Act that's where the unis are

found, right?

WITNESS SCHLACKMAN: Yes.

BY MR. BOWEN:

Q. So I take it, just so we're clarified correctly here, you're not proposing to give us arbitrations under the Act if we can't resolve our differences with you about this Broadband service offering?

A. Again, I'm not a lawyer, and I'm not prepared to say that, and I did not realize that this morning or I would have made a correction this morning.

EXAMINER WOODS: I think the record's clear.

Q. Were you here for my cross of Mr. Lube?

A. No.

Q. Look at page 49. Did you rely on Mr. Lube to make this part of your testimony at the top of the page? Let me read you the part I'm talking about: Ameritech Illinois should not be required to provide line sharing over fiber because it is not technically feasible to do so.

A. Yeah, and I didn't reply on Mr. Lube. I relied on my own knowledge of fiber-fed DLC.

Q. All right. Isn't it correct that the Alcotel lifespan 2000 is offered by the manufacturer configuration that allows through wave division multiplexing the ATM OT3C, and the TDM OC3 be carried in the same filing?

A. And let me just say that all of my testimony is around how the FCC define line sharing which is over a copper loop where the data signal rides the high frequency portion of a copper loop. That's what line sharing is. To say that data signals are multiplexted over same fibers or different fibers, is to me, not line sharing at all.

Q. I understand your position, Ms. Schlackman. Please look with me at the sentence, begins on line 6 of page 49 and concludes on line 9. I'm going to read it to you again: It is not technically feasible to line share across an entire DLC system because the combined voice and data signals cannot be transported across the same optic fiber. Do you see that testimony?

A. Yes.

Q. Isn't it a fact that Alcotel --

A. And in my parenthesis where it says: Line sharing separates frequencies on an analog medium (copper).

Q. Isn't it a fact that your vendor of choice, Alcotel, and its lifespan 2000, offers a configuration that allows you via wave multiplexing to carry both the ATM OC3C data signal and the TDM OC3 signal on the same fibers, if you know?

A. And again, what I have referred to in my testimony is the technical infeasibility as the FCC has defined line sharing. That is the crux of my testimony. I'm not providing any testimony on the Alcotel system and what it does or doesn't do.

Q. You're saying that the DLC system can't transport combined voice and data on the same fiber, aren't you?

A. Line sharing separates frequencies on an analogue medium copper as line sharing is described and provided in the FCCs order.

Q. Ms. Schlackman, I want to you focus now

on part of a sentence: The combined voice and data signals cannot be transported across the same fiber?

A. You are not sharing the same bandwidth. You are not sharing bandwidth in a fiber optic. Line sharing is sharing the bandwidth. You cannot share bandwidth and a fiber optic -- you're not sharing bandwidth.

Q. Okay.

A. Your signal is independent of the bandwidth that that voice is on. You are not anywhere, shape or form sharing that bandwidth.

Q. Isn't it true that you can in fact share the same fiber, the same physical facility, with voice and data using your deployed technology under Pronto Project?

A. I do not know how they split that out when they get it to the central office. If they would mucks it out and put it out to the -- I mean, I don't know what they do as far what terminates the OCD and what terminates the SWITCH.

Q. You don't know the answer to my question?

A. If in fact you're saying that we use the

same fiber to transport the signals, but the signals aren't line shared. You're not sharing bandwidth, even in Alcotel.

Q. Your answer is you don't know?

A. No, the answer is that you don't share bandwidth, so there is no line sharing. You asked me if you could share the fiber. If you could send digital signals across a fiber, then the answer is yes. I could send all the voice, and I can send digital signals across the fiber.

Q. Across the same fiber?

A. But that's not line sharing.

Q. You're agreeing with me that you can in fact send the voice and data across the same physical fiber. Is that your answer?

A. Yes, you can.

Q. Okay. Thank you.